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Attention: William Irvin Dunnegan
By email: wd@dunnegan.com; ls@dunnegan.com

February 8, 2021

**RE: Mattel Inc. v. The Entities d/b/a Goodmenow at the URL Goodmenow.com et al
20 Civ. 10075 (NRB)**

Dear Counsel:

As previously stated, we represent PayPal, Inc.

We refer to your email dated February 5, 2021 attaching a letter dated February 4, 2021 from the Hon. Naomi Reice Buchwald of the U.S. District Court for the Southern District of New York in relation to the above-captioned proceedings.

As a point of order, we ask that you accurately and faithfully reflect the terms of this letter in any submission that you make to the Court on behalf of your client. Further, our client is not a party to these proceedings. Therefore, to the extent any representation has been or will be made by any party with respect to our client in the course of these proceedings, which is not the subject of this letter or of any prior correspondence from or on behalf of our client, our client should not be deemed to accept or consent to such representation.

In order to assist the Court with question #2 directed to the defendants, please note that on or around January 7, 2021, PayPal, Inc. limited access to eight accounts held by PayPal Hong Kong Limited in response to the temporary restraining order granted by the Court on December 30, 2020. On or around January 12, 2021, having conducted further searches in response to the temporary restraining order, PayPal, Inc. limited access to three additional accounts. These limitations on access will remain in place as long as reasonably necessary as determined by PayPal, Inc.

PayPal, Inc. will consider and respond to further orders made by the Court with respect to it, if any, as and when such orders are made.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Clete Samson".

Clete Samson

Copy to:

DGW Kramer LLP
One Rockefeller Plaza, Suite 1060
New York, NY 10020

Attention: Katherine Burghardt Kramer
By email: kkramer@dgwllp.com; lwu@dgwllp.com; jchen@dgwllp.com